

1 Arthur A. Hartinger (SBN: 121521)
ahartinger@meyersnave.com
2 Geoffrey Spellberg (SBN: 121079)
gspellberg@meyersnave.com
3 Reichi Lee (SBN: 228578)
rlee@meyersnave.com
4 Justine Hinderliter (SBN: 245410)
jhinderliter@meyersnave.com
5 MEYERS, NAVE, RIBACK, SILVER & WILSON
555 12th Street, Suite 1500
6 Oakland, California 94607
Telephone: (510) 808-2000
7 Facsimile: (510) 444-1108

8 Attorneys for Defendant
CITY OF OAKLAND
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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 **ROBERT VALLADON,**

14 **Plaintiff,**

15 **v.**

16 **CITY OF OAKLAND,**

17 **Defendant.**
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CASE NO. C06-7478 SI

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR DISMISSAL WITH
PREJUDICE OF SUBGROUPS H
(SURVEILLANCE), I (WARRANT
SERVICE), J (TRAINING), K
(FIREARMS QUALIFICATION), L
(INSTRUCTOR TIME) & M (MEDICAL
EXAMINATIONS)**

21 The parties to this action, by and through their attorneys of record do hereby agree and
22 stipulate that:

23 (1) Plaintiffs Robert Valladon et al. and all of the officers in the following six subgroups
24 shall and do dismiss with prejudice all of the claims which are asserted in subgroups H
25 (Surveillance), I (Warrant Service), J (Training), K (Firearms Qualifications), L (Instructor
26 Time) and M (Medical Examinations);

27 (2) With respect to these subgroups, the parties agree that each shall bear his/its/their
28 attorney's fees and costs as to these subgroups only;

1 (3) The parties agree that no adverse inferences shall be drawn from the withdrawal of
2 these claims;

3 (4) The parties agree and Defendant requests that the currently pending summary judgment
4 motions with respect to each of these subgroups shall be withdrawn. Those motions are at docket
5 numbers 205 (J and K), 202 (L) and a portion of 196 (H and I). [No motion was filed with regard
6 to subgroup M].

7 **IT IS SO STIPULATED.**

8 Dated: July 2, 2009

MEYERS, NAVE, RIBACK, SILVER & WILSON

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10 By: 

Geoffrey Spellberg
Attorneys for Defendant
CITY OF OAKLAND

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13 Dated: July 2, 2009

AITCHISON & VICK/RAINS LUCIA

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15 By: 

William B. Aitchison
Breanne Sheetz
Attorneys for Plaintiff
ROBERT VALLADON

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19 **ORDER**

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21 Pursuant to the above stipulation, all of the claims asserted in subgroups H, I, J, K, L, M by every
22 officer in those subgroups are hereby dismissed with prejudice. The parties to bear their
23 respective fees and costs with respect to these subgroups. No adverse inference shall be drawn
24 from the withdrawal of these claims.

25 Dated: July __, 2009



HON. SUSAN ILLSTON
UNITED STATES DISTRICT COURT